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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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Chapter 11 In re

Case No. 05-44481 (RDD) DELPHI CORPORATION, et al.,

> Debtors. (Jointly Administered)

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NOTICE OF PRESENTMENT OF JOINT STIPULATION AND AGREED ORDER DISALLOWING AND EXPUNGING PROOF OF CLAIM NUMBER 14671 (SIERRA LIQUIDITY FUND LLC AS ASSIGNEE OF DELIVERUS NETWORK INC.) PLEASE TAKE NOTICE that on December 8, 2006, Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proof of claim number 14671 (the "Proof of Claim" or the "Claim") filed by Sierra Liquidity Fund LLC as assignee of Deliverus Network, Inc. (the "Claimant") pursuant to the Debtors' Fifth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. Section 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Claims With Insufficient Documentation And (B) Claims Not Reflected On Debtors' Books And Records (Docket No. 6100) (the "Objection").

PLEASE TAKE FURTHER NOTICE that the Debtors and the Claimant have agreed to settle the Objection with respect to the Proof of Claim and, either because the Claim involves an ordinary course controversy or pursuant to the Order Under 11 U.S.C. §§ 363, 502, And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 4414), have executed a Joint Stipulation And Agreed Order Disallowing and Expunging Proof of Claim Number 14671 (the "Joint Stipulation").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Joint Stipulation, the Debtors and the Claimant have agreed that the Claim should be disallowed and expunged in its entirety, and that the Claimant shall withdraw its Response to the Objection.

PLEASE TAKE FURTHER NOTICE that the Debtors will present the Joint Stipulation for consideration at the hearing scheduled for April 13, 2007, at 10:00 a.m. (prevailing Eastern time) in the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York April 6, 2007

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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